

# Exhibit F

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

EMERSON ELECTRIC CO.,	)	
	)	
	)	
Plaintiff,	)	
	)	Civil Action No. 17-cv-01846-LPS
v.	)	
	)	<u>Jury Trial Demanded</u>
EMERSON QUIET KOOL CO. LTD., and	)	
HOME EASY LTD.,	)	
	)	
	)	
Defendants.	)	

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**EMERSON ELECTRIC CO.’S SECOND SET OF REQUESTS FOR PRODUCTION**

Plaintiff Emerson Electric Co. (“Plaintiff” or “Emerson Electric”) propounds the following requests for production of documents and things upon Defendants Emerson Quiet Kool Co. LTD and Home Easy Ltd. (“Defendants”), and requests that they be answered separately, fully and under oath, with a copy of the documents and things being produced, within thirty (30) days of service pursuant to Federal Rule of Civil Procedure 34, at the offices of Harness, Dickey & Pierce, PLC, 5445 Corporate Drive, Suite 200, Troy, MI 48098, or at such time or place as counsel may agree upon.

**INSTRUCTIONS**

The Instructions set forth in Emerson Electric’s First Set of Requests for Production are incorporated by reference as if fully set forth herein.

**DEFINITION OF TERMS**

The Instructions set forth in Emerson Electric’s First Set of Requests for Production are

incorporated by reference as if fully set forth herein. In addition, the following definition(s) shall apply.

L. “Emerson Radio Case” means the case captioned *Emerson Radio Corporation v Emerson Quiet Kool Co., LTD. and Home Easy LTD.*, Case 2:17-cv-05358-SDW-LDW, which is pending in the United States District Court For The District Of New Jersey.

### **REQUESTS FOR PRODUCTION**

**Request for Production No. 63.** A copy of all transcripts (including exhibits) of each deposition taken in the Emerson Radio Case.

**Request for Production No. 64.** A copy of any documents received by You from third parties in the Emerson Radio Case (i.e., not from Emerson Radio Corporation).

**Request for Production No. 65.** A copy of all declarations submitted by any person, or entity in the Emerson Radio Case.

**Request for Production No. 66.** A copy of any expert reports (including exhibits) submitted or exchanged by any party in the Emerson Radio Case.

**Request for Production No. 67.** Documents sufficient to identify the retailers (by name and location) of any of Your products sold under the EMERSON QUIET KOOL Mark.

**Request for Production No. 68.** A copy of any contracts and/or agreements between You and any third party regarding the distribution, promotion, advertisement and/or sale of products under the EMERSON QUIET KOOL Mark.

**Request for Production No. 69.** Documents sufficient to identify any keywords purchased, selected, or used, by You in connection with the advertisement of Your products sold under the EMERSON QUIET KOOL Mark (for example, Google Ad Words, Amazon Keywords).

**Request for Production No. 70.** All documents regarding Your use, acquisition and/or ownership of the EMERSON QUIET KOOL Mark, including but not limited to, a copy of any licenses and/or agreements.

**Request for Production No. 71.** All documents related to any licenses, permission or authorizations granted by You to third parties regarding the use of the EMERSON QUIET KOOL Mark, including but not limited to a copy of any licenses and/or agreements.

**Request for Production No. 72.** All documents regarding use of the EMERSON QUIET KOOL Mark by You.

**Request for Production No. 73.** All documents regarding use of the EMERSON QUIET KOOL Mark by any third party, including any alleged prior users, licensees and/or owners of the EMERSON QUIET KOOL Mark.

**Request for Production No. 74.** All documents evidencing and/or related to any customer complaints about any of Your products offered under the EMERSON QUIET KOOL Mark.

**Request for Production No. 75.** All documents relating to Your allegation that the EMERSON QUIET KOOL Mark was not (or has not) been abandoned at any point in time (including by You, or, by any alleged prior user(s) or owner(s) of the EMERSON QUIET KOOL Mark).

**Request for Production No. 76.** All documents and/or communications between You and any third party (including any alleged prior user(s) or owner(s) of the EMERSON QUIET KOOL Mark).

**Request for Production No. 77.** All documents related to Your relationship with Almo Corporation, including any reports and/or agreements related to the advertisement, promotion, distribution and/or sale of products under the EMERSON QUIET KOOL Mark.

**Request for Production No. 78.** All documents relating to the 2009 Agreement attached as Exhibit G to Emerson Electric's Complaint, including any communications with any third parties and/or Emerson Electric.

**Request for Production No. 79.** All documents relating to the 2011 Agreement attached as Exhibit H to Emerson Electric's Complaint, including any communications with any third parties and/or Emerson Electric.

**Request for Production No. 80.** Documents sufficient to demonstrate and/or explain Your relationship with Jiangsu Bangning Science & Technology Co. Ltd.

**Request for Production No. 81.** All documents relating to Your ownership and/or use of the www.emersonquietkool.com domain.

**Request for Production No. 82.** A copy of the native file of the video shown at the URL: [https://youtu.be/Xh8oxt\\_rn6M](https://youtu.be/Xh8oxt_rn6M).

**Request for Production No. 83.** A copy of the native file of the video shown at the URL: <https://youtu.be/PI58Ayj6VWg>.

**Request for Production No. 84.** A copy of the native file of the video shown at the URL: <https://youtu.be/-lF3NjncgrU>.

**Request for Production No. 85.** A copy of the native file of the video shown at the URL: [https://youtu.be/USjI\\_gInn6w](https://youtu.be/USjI_gInn6w).

**Request for Production No. 86.** A copy of the native file of the video shown at the URL: <https://youtu.be/cFG44ToL40Q>.

**Request for Production No. 87.** A copy of the native file of the video shown at the URL: <https://youtu.be/l5uAgqs7JdE>.

**Request for Production No. 88.** A copy of the native file of the video shown at the  
URL:<https://youtu.be/mn4icSc1UJw>.

Dated: September 18, 2020

Respectfully submitted,

/s/ Joel R. Samuels

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*Attorneys for Plaintiff Emerson Electric Co.*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on September 18, 2020, a copy of the foregoing **Emerson Electric's Second Set Of Requests for Production of Documents and Things** was served via Electronic Mail to the following:

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*Attorneys for Defendant Emerson Quiet Kool Co Ltd. and Defendant Home Easy Ltd.*

/s/ Joel R. Samuels

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